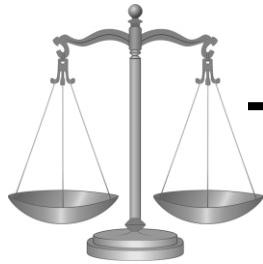


HELEN F. DALTON & ASSOCIATES, P.C.
ATTORNEYS AT LAW



80-02 Kew Gardens Road, Suite 601, Kew Gardens, NY 11415
Tel. (718) 263-9591 Fax. (718) 263-9598

December 18, 2020

VIA ECF

The Honorable District Judge John P. Cronan
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: **Tellez Garcia, et al. v. Sal 79 Associates, Inc. et al.**
Civil Case No.: 1:19-cv-01301 (JPC)(KNF)

Dear Judge Cronan:

Our office represents the Plaintiffs in the above-referenced matter and we submit this letter motion to respectfully request a brief extension of time to submit the parties' settlement agreement and motion for approval pursuant to *Cheeks v. Freeport Pancake House, Inc.*, 796 F.3d 199 (2d Cir. 2015).

The aforementioned documents were due to the Court yesterday, however, the parties are in the process of finalizing the settlement agreement for their clients' signatures. The parties are currently working in good faith to finalize the settlement documents. This is the second request for an extension of time to file the settlement documents and this request does not affect any other scheduled dates or deadlines. Our office apologizes for the late filing as we were not in the office yesterday due to the inclement weather. Defendants' counsel timely consented to this request for an extension of time yesterday.

Given the upcoming holidays, we respectfully request that the parties' time to file the settlement documents be extended to January 4, 2021.

We thank the Court for its consideration on this matter and remain available to provide any additional information.

Plaintiffs' request is GRANTED. The parties shall file all necessary documents for Court approval by January 4, 2021.

SO ORDERED.

Date: December 18, 2020
New York, New York

Respectfully submitted,

/s/
Roman Avshalumov, Esq.

A handwritten signature in black ink, appearing to read "John P. Cronan".
JOHN P. CRONAN
United States District Judge